

AES Agremax

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AES Well Field

Among our concerns is potential leaching from Agremax deposited at an AES well field north of the AES Guayama generating facility. EPA notes that, beyond being located in a flood plain, the AES well field presents a number of potential environmental risk factors, because it is situated adjacent to wetlands and a surface water body, the Guaymani river (which EPA understands is used for subsistence fishing), as well as near a canal receiving and distributing water from nearby Lake Melania. It is also located, via the Guaymani River, upstream of several federally endangered species.

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In June 2011, EPA met with the coal combustion product manager for AES P.R., who informed us that the Guayama coal fired power plant mixes all of its bottom and fly ash with the spent lime from its air pollution control equipment, to produce over 4,000 tons/week of Agremax. EPA accompanied several P.R. environmental advocates on site visits to ten areas where Agremax had been placed on land in the municipalities of Arroyo, Guayama, and Salinas, and observed that Agremax had been disposed of in great amounts over extensive areas, some in proximity to rivers, streams, and wetlands. We met with the P.R. Department of Health to review their groundwater data, obtained from wells near the land placement sites (no exceedances observed), and spoke at length with EQB, who subsequently provided us their aquifer ground water level data (no relevant contaminant analysis). We also reviewed ground water data from the P.R. Aqueduct and Sewer Authority (no exceedances observed).

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In March 2012, EPA, accompanied by EQB, obtained a composite sample of "manufactured" Agremax stored at the AES Guayama facility. The composite sample was analyzed by an EPA-ORD contract laboratory, using two of the LEAF methods. The analytical results gave us a clearer understanding of the heavy metal levels in Agremax under a range of pH conditions. ORD stated that "Agremax" had contaminant levels no different than observed in a "typical" coal ash. ORD also performed follow-up analysis, which confirmed these findings.